FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Pilsen East Mall LP
DOCKET NO.: 24-26610.001-R-1
PARCEL NO.: 17-21-312-003-0000

The parties of record before the Property Tax Appeal Board are Pilsen East Mall LP, the appellant, by Michael R. Davies, attorney-at-law of Ryan Law, PLLC in Chicago, and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds ***No Change*** in the assessment of the property as established by the **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND:	$9,805
IMPR.:	$59,397
TOTAL:	$69,202

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2024 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property is improved with a two-story mixed-use building of frame construction that contains 4,983 square feet of building area. The building is approximately 142 years old. Features of the property a partial basement and four bathrooms. The property has a 2,650 square foot site located in Chicago, West Chicago Township, Cook County. The subject is a class 2-12 mixed-use property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables consisting of class 2-12 properties improved with two-story or three-story buildings of masonry exterior construction that range in size from 4,942 to 5,390 square feet of building area and are from 90 to 133 years old. Each property has a partial or full basement. Two comparables have a 1.5-car or 2-car garage. The comparables have three or four full bathrooms,

and three comparables have an additional one or two half bathrooms. These properties have the same neighborhood code as the subject property and are located from 1.33 to 2.93 miles from the subject property. Their improvement assessments range from $42,610 to $46,587 or from $8.45 to $8.79 per square foot of building area. The appellant requested the subject's improvement assessment be reduced to $43,103.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $69,202. The subject property has an improvement assessment of $59,397 or $11.92 per square foot of building area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables composed of class 2-12 properties improved with two-story mixed-use buildings of frame construction that range in size from 3,242 to 4,316 square feet of building are and are from 27 to 143 years old. Three comparables have a partial basement and one comparable has a full basement finished with an apartment. One comparable has central air conditioning and three comparables have a 1.5-car, 2-car or 3-car garage. The comparables have 2½, 4 or 4½ bathrooms. The comparables have the same neighborhood code as the subject and are located ¼ of mile from the subject property with comparables #1 and #2 being located along the same street as the subject. These properties have improvement assessments that range from $41,400 to $60,288 or from $11.30 to $15.79 per square foot of building area.

Conclusion of Law

The appellant contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted information on nine equity comparables to support their respective positions. The Board gives less weight to the appellant's comparables as these properties are not as similar to the subject in location as are the comparables provided by the board of review. The Board gives less weight to board of review comparable #3 due to differences from the subject in age. The Board gives less weight to board of review comparable #4 due to differences from the subject in size. The Board gives most weight to board of review comparables #1 and #2 that are located along the same street and approximately ¼ of a mile from the subject property. These comparables are improved with buildings smaller than the subject, suggesting upward adjustments for size would be appropriate. However, each property has a garage, unlike the subject, suggesting downward adjustments for this difference would be proper. These two comparables have improvement assessments of $60,288 and $45,653 or $13.97 and $11.30 per square foot of building area, respectively. The subject's improvement assessment of $59,397 or $11.92 per square foot of building area is bracketed by the best comparables in this record supporting the conclusion the property is being equitably assessed. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the

subject's improvement was inequitably assessed and a reduction in the subject's assessment is not justified.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.

Chairman

Member

Member

Member

Member

DISSENTING:

C E R T I F I C A T I O N

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: October 20, 2026

Clerk of the Property Tax Appeal Board

IMPORTANT NOTICE

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-215 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

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